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**MEMO ENDORSED**

March 23, 2018

**BY ECF**

Hon. P. Kevin Castel  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: Sullivan, et al. v. Barclays plc, et al., No. 13-cv-2811 (S.D.N.Y.) (PKC)

Dear Judge Castel:

Pursuant to Section 1.B. of Your Honor's Individual Practices, Plaintiffs respectfully submit this letter in order to make this unopposed request for an extension of 14 days to the deadline for the completion of all expert discovery relating to class certification (from July 27, 2018 to August 10, 2018) and for Plaintiffs' motion for class certification (from August 1, 2018 to August 15, 2018). No prior requests for this relief have been made. The requested extension would amend only two deadlines in the April 10, 2017 Scheduling Order (ECF No. 337), as modified by the November 17, 2017 Revised Case Management Plan and Scheduling Order (ECF No. 377), and will not affect any other scheduled dates. Such extension will not prejudice the administration of justice in any way. Plaintiffs respectfully request that the Court approve the enclosed Proposed Amended Scheduling Order, which also includes interim deadlines relating to class certification that Plaintiffs and Non-Settling Defendants have agreed to. The Non-Settling Defendants consent to Plaintiffs' request.<sup>1</sup>

For the foregoing reasons, Plaintiffs respectfully request that the Court grant the requested relief.

Thank you very much.

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<sup>1</sup> Citigroup Inc., Citibank, N.A., JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.

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Respectfully submitted,

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cc: All Counsel of Record (by ECF)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

STEPHEN SULLIVAN, WHITE OAK FUND LP,  
CALIFORNIA STATE TEACHERS' RETIREMENT  
SYSTEM, SONTERRA CAPITAL MASTER FUND,  
LTD., FRONTPOINT PARTNERS TRADING  
FUND, L.P., AND FRONTPOINT AUSTRALIAN  
OPPORTUNITIES TRUST on behalf of themselves  
and all others similarly situated,

Plaintiffs,

- against -

BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS  
CAPITAL INC., BNP PARIBAS S.A., CITIGROUP,  
INC., CITIBANK, N.A., COÖPERATIEVE  
CENTRALE RAIFFEISEN-BOERENLEENBANK  
B.A., CRÉDIT AGRICOLE S.A., CRÉDIT AGRICOLE  
CIB, DEUTSCHE BANK AG, DB GROUP SERVICES  
UK LIMITED, HSBC HOLDINGS PLC, HSBC BANK  
PLC, ICAP PLC, ICAP EUROPE LIMITED, J.P.  
MORGAN CHASE & CO., JPMORGAN CHASE  
BANK, N.A., THE ROYAL BANK OF SCOTLAND  
PLC, SOCIÉTÉ GÉNÉRALE SA, UBS AG AND JOHN  
DOE NOS. 1-50,

Defendants.

Docket No. 13-cv-02811 (PKC)

ECF Case

**[PROPOSED] AMENDED SCHEDULING ORDER REGARDING  
CLASS CERTIFICATION PROCEEDINGS**

The April 10, 2017 Scheduling Order, as amended by the November 17, 2017 Revised Case Management Plan and Scheduling Order, is modified as follows:

Event	Existing Deadline	Modified Deadline
Completion of expert discovery relating to class certification.	July 27, 2018	August 10, 2018
Deadline for plaintiffs to file motion for class certification.	August 1, 2018	August 15, 2018

The Court further approves the following additional deadlines relating to class certification, as agreed to by the parties:

Event	Deadline
Plaintiffs' class certification expert report(s) due.	April 16, 2018
Defendants' class certification expert report(s) due.	June 14, 2018
Plaintiffs' class certification rebuttal report(s) due.	July 13, 2018
Defendants' opposition to motion for class certification due.	October 15, 2018
Plaintiffs' reply in support of their motion for class certification due.	November 29, 2018

In all other respects, the April 10, 2017 Scheduling Order, as amended by the November 17, 2017 Revised Case Management Plan and Scheduling Order, remains in full force and effect.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
P. KEVIN CASTEL  
UNITED STATES DISTRICT JUDGE